

**IN THE UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
AIKEN DIVISION**

Alisha Johnson,

Plaintiff,

v.

Savannah River Nuclear Solutions,

Defendant.

C/A No.: 1:24-cv-02612-JDA-PJG

**CONSENT MOTION FOR EXTENSION TO  
TIME TO FILE PLAINTIFF'S RESPONSE**

Plaintiff respectfully requests an extension to file Plaintiff's Response to Defendant's Motion for Summary Judgment filed on **June 12, 2025**. [Dkt. 38]. The current deadline for Plaintiff's Response is **June 26, 2025**. Counsel for Plaintiff respectfully requests an extension of **thirty (30) days** to file the Response. The Response would be due on **July 28, 2025** (July 26<sup>th</sup> is a Saturday). This is Plaintiff's first request for an extension to file the Response, and this extension would not affect any of the deadlines set out in the Fourth Amended Scheduling Order. [Dkt. 32].

The grounds for this extension are:

1. Plaintiff's counsel will be out of the country from June 27, 2025, through July 11, 2025. Counsel served a Notice of Request for Protection from Court Appearance on March 25, 2025. [Dkt. 29].
2. Due to international travel and multiple pressing deadlines in both of Plaintiff's counsels' other cases, additional time is needed to complete a proper response to Defendant's extensive Motion.

This request is made in good faith, not for purposes of delay, and will not cause any prejudice to any party. Defendant's counsel has graciously consented to Plaintiff's request for an extension.

Therefore, with the consent of Defendant, Plaintiff respectfully requests this Court GRANT the motion for an extension and provide **thirty (30) days**, until **July 28, 2025**, to file Plaintiff's Response to Defendant's Motion for Summary Judgment.

*Respectfully submitted by,*

**CROMER BABB & PORTER, LLC**

BY: s/Jillian M. Lesley

Jillian M. Lesley (Fed.# 14090)

Julius W. Babb, IV (Fed # 10500)

1418 Laurel Street, Suite A

Columbia, South Carolina 29201

Post Office Box 11675

Columbia, South Carolina 29211

Phone:(803) 799-9530

Fax:(803) 799-9533

jill@cromerbabb.com

jay@cromerbabb.com

June 20, 2025